

**Federal Defenders
OF NEW YORK, INC.**

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MEMO ENDORSED

September 28, 2023

BY ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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Re: United States v. Jeremy Pinales Diaz, 23 Cr. 493 (VEC)

Dear Judge Caproni:

I write with the consent of Pretrial Services to respectfully request that the Court modify Jeremy Pinales Diaz's bail condition of home detention to a curfew. The Government defers to the judgment of Pretrial Services.

Mr. Pinales Diaz was arrested and presented in magistrate's court on August 23, 2023. Although Pretrial Services recommended that day that Mr. Pinales Diaz be released with a curfew, the Government requested that he be released on home detention, and the Court agreed. Since then, Mr. Pinales Diaz has been doing very well. His supervising Pretrial Officer, Marlon Ovalles, reports no issues, and he has obtained a new full-time job at a Manhattan branch of a fast casual restaurant chain that serves salads.

To allow for greater flexibility with extra shifts and schedule changes at that new job, Mr. Pinales Diaz requests that his bail conditions be amended from home detention to a curfew. As noted, Pretrial originally recommended a curfew rather than home detention and consents to this modification, and the Government defers to the judgment of Pretrial Services.

Thank you for your consideration.

Application GRANTED. The conditions of Mr. Diaz's release are modified to include a curfew as set by Pretrial Services instead of home detention.

SO ORDERED.



09/28/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ _____
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CC: AUSA Henry Ross